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5 Attorneys for Defendant  
6 LAP THE CHUNG

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA, ) No. CR 11-0097 CRB  
12 Plaintiff, )  
13 v. ) STIPULATION AND [proposed]  
14 LAP THE CHUNG, ) ORDER TO PERMIT DEFENDANT  
15 Defendant. ) EASTERN DISTRICT OF  
CALIFORNIA

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17 Defendant Lap The Chung has been released from custody in this matter on various terms  
18 and condition, and under the supervision of Pretrial Services. The Court has limited his travel to  
19 the Northern District of California.

20 Mr. Chung wishes to travel with his wife and children during the children's spring break  
21 in mid-March 2012 to the Eastern District of California to visit family and friends. Mr. Chung's  
22 Pretrial Services Officer, Paul Mamaril, informed undersigned counsel for Mr. Chung that he has  
23 no objection to permitting Mr. Chung to travel to the Eastern District of California, so long as he  
24 informs him in advance of the dates of his travel and the place where he will stay.  
25

26 The parties STIPULATE that this Court may modify the conditions of Mr. Chung's  
27 pretrial release to permit him to travel in the Northern and Eastern Districts of California, so long

1 as he obtains advance approval from Pretrial Services for any travel into the Eastern District of  
2 California.

3 IT IS SO STIPULATED.

4 DATED: April 9, 2012

5 \_\_\_\_\_ /s/  
6 Robert Rees  
7 Assistant United States Attorney

8 DATED: April 9, 2012

9 \_\_\_\_\_ /s/  
10 Scott A. Sugarman  
11 Attorney for Lap The Chung

12 SO ORDERED.

13 DATE: April 9, 2012

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16 UNITED STATES MAGISTRATE JUDGE  
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